

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHÂTEAU FIDUCIAIRE S.A. as TRUSTEE  
of THE MAP TRUST, on Behalf of Itself and  
all Others Similarly Situated,

Plaintiff,

v.

ARGUS INTERNATIONAL LIFE  
BERMUDA LIMITED, ARGUS GROUP  
HOLDINGS LIMITED, MASSACHUSETTS  
MUTUAL LIFE INSURANCE CO.,  
OPPENHEIMER ACQUISITION  
CORPORATION, RYE INVESTMENT  
MANAGEMENT, RYE SELECT BROAD  
MARKET FUND L.P., RYE SELECT  
BROAD MARKET INSURANCE  
PORTFOLIO, LDC, TREMONT  
[BERMUDA] LIMITED, TREMONT  
CAPITAL MANAGEMENT INC.,  
TREMONT GROUP HOLDINGS, INC.,  
TREMONT INTERNATIONAL  
INSURANCE LIMITED, and TREMONT  
PARTNERS INC.,

Defendants.

Civil Action No. 1:09-cv-00557

(Additional captions on following pages)

**NOTICE OF MOTION OF PLAINTIFFS CHATEAU FIDUCIAIRE S.A., AS TRUSTEE  
OF THE MAP TRUST, THE HARRIET RUTTER KLEIN REVOCABLE TRUST, AND  
THE MATTHEW L. KLEIN IRREVOCABLE FAMILY TRUST (“MOVANTS”) TO  
TRANSFER AND CONSOLIDATE THE RELATED CLASS ACTIONS, APPOINT  
INTERIM CLASS COUNSEL, AND COORDINATE THE CONSOLIDATED ACTION  
WITH THE RELATED PSLRA AND STATE CASES**

THE GEOFFREY RABIE CREDIT SHELTER TRUST and THE JOANE BRENDA RABIE CREDIT SHELTER TRUST, Individually, and On Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

ARGUS GROUP HOLDINGS LTD., ARGUS INTERNATIONAL LIFE BERMUDA LTD., MASSMUTUAL HOLDING LLC, MASSACHUSETTS MUTUAL LIFE INSURANCE CO., OPPENHEIMER ACQUISITION CORP., RYE INVESTMENT MANAGEMENT, RYE SELECT BROAD MARKET FUND L.P., RYE SELECT BROAD MARKET INSURANCE PORTFOLIO, LDC, TREMONT (BERMUDA) LTD., TREMONT CAPITAL MANAGEMENT, INC., TREMONT GROUP HOLDINGS, INC., TREMONT INTERNATIONAL INSURANCE LTD., TREMONT PARTNERS, INC., ERNST & YOUNG LLP and KPMG LLP,

Defendants.

Civil Action No. 1:09-cv-01466

(Additional captions on following pages)

THE HARRIET RUTTER KLEIN  
REVOCABLE TRUST, on Behalf of Itself and  
all Others Similarly Situated,

Plaintiff,

v.

ARGUS INTERNATIONAL LIFE  
BERMUDA LIMITED, ARGUS GROUP  
HOLDINGS LIMITED, MASSACHUSETTS  
MUTUAL LIFE INSURANCE CO.,  
OPPENHEIMER ACQUISITION  
CORPORATION, RYE INVESTMENT  
MANAGEMENT, RYE SELECT BROAD  
MARKET FUND L.P., RYE SELECT  
BROAD MARKET INSURANCE  
PORTFOLIO, LDC, TREMONT  
[BERMUDA] LIMITED, TREMONT  
CAPITAL MANAGEMENT INC.,  
TREMONT GROUP HOLDINGS, INC.,  
TREMONT INTERNATIONAL  
INSURANCE LIMITED, TREMONT  
PARTNERS INC., ERNST & YOUNG LLP,  
and KPMG LLP,

Defendants.

(Additional captions on following pages)

THE MATTHEW L. KLEIN IRREVOCABLE  
FAMILY TRUST dated October 27, 1997, on  
Behalf of Itself and all Others Similarly  
Situated,

Plaintiff,

v.

ARGUS INTERNATIONAL LIFE  
BERMUDA LIMITED, ARGUS GROUP  
HOLDINGS LIMITED, MASSACHUSETTS  
MUTUAL LIFE INSURANCE CO.,  
OPPENHEIMER ACQUISITION  
CORPORATION, RYE INVESTMENT  
MANAGEMENT, RYE SELECT BROAD  
MARKET FUND L.P., RYE SELECT  
BROAD MARKET INSURANCE  
PORTFOLIO, LDC, TREMONT  
[BERMUDA] LIMITED, TREMONT  
CAPITAL MANAGEMENT INC.,  
TREMONT GROUP HOLDINGS, INC.,  
TREMONT INTERNATIONAL  
INSURANCE LIMITED, TREMONT  
PARTNERS INC., ERNST & YOUNG LLP,  
and KPMG LLP,

Defendants.

(Additional captions on following pages)

YVETTE FINKELSTEIN, On Behalf of Herself and  
All Others Similarly Situated, and Derivatively On  
Behalf of AMERICAN MASTERS BROAD  
MARKET PRIME FUND, L.P.,

Plaintiff,

v.

TREMONT GROUP HOLDINGS, INC.,  
OPPENHEIMER ACQUISITION CORPORATION,  
MASSACHUSETTS MUTUAL LIFE INSURANCE  
CO., and ERNST & YOUNG LLP,

Defendants.

and AMERICAN MASTERS BROAD MARKET  
PRIME FUND, L.P.,

Nominal Defendant.

Civil Action No. 1:08-cv-11141

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(Additional captions on following pages)

ARTHUR M. BRAINSON IRA R/O,

Plaintiff,

v.

RYE SELECT BROAD MARKET FUND, L.P.,  
TREMONT PARTNERS, INC., TREMONT  
GROUP HOLDINGS, INC., RYE INVESTMENT  
MANAGEMENT, JIM MITCHELL, and ROBERT  
SCHULMAN,

Defendants.

Civil Action No. 1:08-cv-11212

GROUP DEFINED PENSION PLAN & TRUST,  
Individually and On Behalf of All Others Similarly  
Situated,

Plaintiffs,

v.

TREMONT MARKET NEUTRAL FUND, L.P.  
(formerly named, American Masters Market Neutral  
Fund, L.P.), TREMONT PARTNERS, INC.,  
TREMONT GROUP HOLDINGS, INC.,  
OPPENHEIMER ACQUISITION CORP.,  
OPPENHEIMER FUNDS, INC.,  
MASSACHUSETTS MUTUAL LIFE  
INSURANCE COMPANY, ERNST & YOUNG,  
LLP, and JOHN DOES 1-100.

Defendants.

Civil Action No. 1:08-cv-11359

EILEEN S. SILVERS and RICHARD J.  
BRONSTEIN, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiffs,

v.

TREMONT GROUP HOLDINGS, INC.,  
TREMONT PARTNERS, INC., RYE  
INVESTMENT MANAGEMENT, INC.,  
OPPENHEIMER ACQUISITION  
CORPORATION, MASSACHUSETTS MUTUAL  
LIFE INSURANCE CO., RYE SELECT BROAD  
MARKET FUND, L.P., f/k/a/ AMERICAN  
MASTERS BROAD MARKET PRIME FUND,  
L.P., RYE SELECT BROAD MARKET XL FUND,  
L.P., ERNST & YOUNG, LLP, and KPMG LLP,

Defendants.

Civil Action No. 1:09-cv-01111

(Additional captions on following pages)

RICHARD PESHKIN, On Behalf Of Himself As  
An Individual, On Behalf Of Spectrum Select L.P. As  
A Limited Partner, And On Behalf Of All Others  
Similarly Situated,

Plaintiff,

v.

TREMONT GROUP HOLDINGS, INC.,  
TREMONT PARTNERS, INC., RYE INVESTMENT  
MANAGEMENT (a.k.a. RYE INVESTMENTS INC.),  
OPPENHEIMER ACQUISITION CORPORATION,  
OPPENHEIMERFUNDS, INC., MASSACHUSETTS  
MUTUAL LIFE INSURANCE COMPANY, ROBERT  
I. SCHULMAN, JIM MITCHELL, JOHN V.  
MURPHY, KPMG L.L.P., BANK OF NEW YORK  
MELLON CORPORATION, BNY ALTERNATIVE  
INVESTMENT SERVICES, INC., SELECT  
SPECTRUM PARTNERS, LLC, AND JOHN DOES 1-  
100 INCLUSIVE,

Defendants.

-and-

RYE SELECT BROAD MARKET FUND LP,  
RYE SELECT BROAD MARKET PRIME FUND LP,  
RYE SELECT BROAD MARKET XL FUND LP, AND  
SPECTRUM SELECT L.P.,

Nominal Defendants.

(Additional captions on following pages)



ARTHUR E. LANGE and ARTHUR C. LANGE,  
Individually and on Behalf of All Others Similarly  
Situated,

Plaintiffs,

v.

MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY; OPPENHEIMER ACQUISITION  
CORPORATION; TREMONT GROUP HOLDINGS,  
INC.; RYE INVESTMENT MANAGEMENT GROUP;  
HARRY HODGES; RYE SELECT BROAD MARKET  
PRIME FUND, L.P.; RYE SELECT BROAD  
MARKET FUND, L.P.; and TREMONT PARTNERS,  
INC.

Defendants.

Civil Action No. 1:08-cv-11117

(Additional captions on following pages)

John F. Keane, Jr., Trustee, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

Civil Action No. 1:09-cv-1396

Tremont Group Holdings, Inc., Rye Investment  
Management, Tremont Partners Inc., Robert Ivan  
Schulman, Rupert Andrew Allan, Cynthia J. Nicoll,  
Stephen Thomas Clayton, Oppenheimer Acquisition  
Corporation, Mass Mutual Holdings LLC,  
Massachusetts Mutual Life Insurance Company, Select  
Spectrum Partners LLC, Gary Busel, Ronald Pearson,  
KPMG L.L.P. and BDO Seidman L.L.P.,

Defendants.

**PLEASE TAKE NOTICE** that plaintiffs Chateau Fiduciaire S.A., as Trustee of the Map Trust, the Harriet Rutter Klein Revocable Trust, and the Matthew L. Klein Irrevocable Family Trust (“Movants”) hereby move before this Court for an Order: (i) transferring the following cases to Judge Griesa pursuant to Rule 15(a) of the Rules for Division of Business Among District Judges: *The Geoffrey Rabie Credit Shelter Trust v. Argus Group Holdings Ltd.*, 09 cv 1466 (S.D.N.Y.) (unassigned); *The Harriet Rutter Klein Revocable Trust v. Argus Int’l Life Bermuda Ltd.*, 09 cv 2253 (S.D.N.Y.) (unassigned); and *The Matthew L. Klein Irrevocable Family Trust v. Argus Int’l Life Bermuda Ltd.*, 09 cv 2254 (S.D.N.Y.) (unassigned) (the “Transferred Cases”); (ii) consolidating the Transferred Cases with the case captioned: *Chateau Fiduciaire v. Argus Int’l Life Bermuda Ltd.*, 09 cv 557 (S.D.N.Y.) (TPG), pursuant to Federal Rule of Civil Procedure 42(a); (collectively, the “Insurance Cases”); (iii) appointing the law firm of Wolf Haldenstein Adler Freeman & Herz LLP (“Wolf Haldenstein”) as interim class counsel for the Insurance Cases; and (iv) coordinating the Insurance Cases with the PSLRA

Cases and State Cases (as defined in the memorandum of law submitted herewith). This motion is supported by a Memorandum of Law, the [Proposed] Order, the Declaration of Gregory M. Nespole and the exhibits attached thereto.

DATED: March 13, 2009

WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP

By:

/s/ Gregory M. Nespole  
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